

January 10, 2022

Note to file regarding allegation 21.08:

On September 30, 2021, Dr. Francesca Grifo received an anonymous voicemail message reporting that EPA's Scientific Integrity Policy was violated in the development of OCSPP's Risk Evaluation for Asbestos. The allegation asserted that the Agency's decision not to consider legacy uses of asbestos in the risk evaluation is a violation of the Scientific Integrity Policy. The allegation also asserted that "the cost benefit analysis is wrong" in the risk evaluation.

In screening this allegation, it was confirmed that EPA is considering legacy uses of asbestos. EPA's website indicates:

"... as a result of the November 2019 decision of the U.S. Court of Appeals for the Ninth Circuit in *Safer Chemicals Healthy Families v. EPA*, EPA plans to evaluate legacy uses and associated disposals, other types of asbestos fibers in addition to chrysotile, and conditions of use of asbestos in talc and talc-containing products in a supplemental effort that is the focus of part 2 of the risk evaluation for asbestos.

For the Risk Evaluation for Asbestos Part 2: Supplemental Evaluation Including Legacy Uses and Associated Disposals of Asbestos, EPA will evaluate the conditions of use of asbestos excluded from the part 1 asbestos risk evaluation that was completed in December 2020."¹

This allegation was received anonymously and no contact information was provided by the submitter. As such, the SI Program was unable to obtain further information from the submitter regarding the "cost benefit analysis." The statement that "the cost benefit analysis is wrong" does not provide sufficient basis with which to open an inquiry into a loss of scientific integrity.

The SI Program consulted the Deputy Scientific Integrity Officials from OCSPP and the Office of Policy (OP) to ascertain whether any scientific integrity concerns had been raised to them regarding the benefit-cost analysis for asbestos. None were identified.

There is insufficient information to consider this allegation further. As such, this allegation is closed due to insufficient information.

¹ <https://www.epa.gov/assessing-and-managing-chemicals-under-tsca/risk-evaluation-asbestos-part-2-supplemental-evaluation>